UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

- (1) ADIKA MANIGO,
- (2) DAVID GOLISANO, and
- (3) DAMIEN HUNT,

Defendants

Criminal No. 24-10353-AK

JOINT INITIAL STATUS REPORT

Defendants are charged with Conspiracy to Distribute and to Possess with Intent to Distribute Controlled Substances (Count One), in violation of 21 U.S.C. §§ 846. Defendants Manigo and Hunt are additionally charged with Possession with Intent to Distribute Fentanyl and Cocaine (Count Two). Defendant Manigo has been detained since his arrest on November 21, 2024. Defendants Hunt and Golisano are released on conditions.

Pursuant to Local Rule 116.5(a), the parties submit the following joint status report.

Automatic Discovery and Discovery Requests

The government provided initial automatic discovery on December 19, 2024. Defendants seek additional time to review this discovery.

2. Timing of Additional Discovery

The government will provide any additional exculpatory information as provided by the Local Rules.

3. Timing of Additional Discovery Requests

Defendants reserve the right to make discovery requests upon complete review of discovery produced to-date.

4. **Protective Orders**

The Court entered a Protective Order on December 11, 2024, which was subsequently signed by all parties and docketed on December 17, 2024.

5. **Pretrial Motions**

Defendants have not filed any pretrial motions under Fed. R. Crim. P. 12(b). Defendants reserves the right to file after complete review of discovery.

6. Timing of Expert Disclosures

The Court has not yet established a date for expert witness disclosures. The government will provide expert disclosures as required by Rule 16.

7. **Defenses**

The defendants need additional time to review discovery before deciding whether defendants intend to raise any affirmative defenses to the present charges.

8. Excludable Delay

Zero days of non-excludable time have accrued and 70 days will remain under the Act in which the case must be tried.

9. Plea Discussions, Trial

The parties have not engaged in plea negotiations. Any trial is anticipated to last 5-6 days.

10. Timing of Interim Status Conference

The Court may wish to cancel the conference scheduled for January 21, 2025, as there is no need for the hearing in light of the information set forth in this report. The parties suggest that the Court set an interim status conference in 30-45 days. The parties jointly request that any Speedy

Trial Act time be excluded from January 21, 2025, until any further status conference that the Court schedules.

Respectfully submitted,

JOSHUA S. LEVY United States Attorney

By: /s/ Samuel R. Feldman
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants .

/s/ Samuel R. Feldman
Samuel R. Feldman
Assistant United States Attorney

Date: January 17, 2025